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# 3A

## Action

### *Public Hearing*

#### **Proposed Addition to California Code of Regulations, Title 5 Sections 80089.3 and 80089.4, Pertaining to Introductory and Specific Subject Matter Authorizations**

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## **AGENDA INSERT**

**Executive Summary:** The proposed addition to California Code of Regulations, Title 5 Sections 80089.3 and 80089.4, pertaining to introductory and specific subject matter authorizations is being presented for public hearing.

**Recommended Action:** Staff recommends that the Commission adopt the proposed addition to California Code of Regulations, Title 5 Sections 80089.3 and 80089.4, pertaining to introductory and specific subject matter authorizations with the changes to Section 80089.4 and direct staff to prepare a 15 Day Notice.

**Presenter:** Terri H. Fesperman, Assistant Consultant, Certification, Assignment, and Waivers Division

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# Proposed Addition to California Code of Regulations, Title 5 Sections 80089.3 and 80089.4, Pertaining to Introductory and Specific Subject Matter Authorizations

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## Updated Tally of Responses

### Tally of All Responses

<i>In Support</i>	<i>In Opposition</i>
5 personal opinions	4 personal opinions
0 organizational opinions	2 organizational opinion
<b>Total Responses: 11</b>	

### *Responses Representing Individuals in Support*

1. Ellen Curtis Pierce, Assistant Provost for Teacher Education, Chapman University

### *Responses Representing Individuals Not in Support*

1. Kimiko Ego, Teacher

*Comment:* I am writing to you regarding the proposed additions to California Code of Regulations, Title 5 Sections 80089.3 and 80089.4 pertaining to introductory and specific subject matter authorizations.

During the 2002-2003 school year I was granted a sabbatical to return to a university program to complete a Bachelor's degree in Japanese so that I could teach Japanese in high school. In August, 2003, I completed a degree in East Asian Languages and Cultures (concentration in Japanese) at the University of Southern California.

Since the passage of "No Child Left Behind," I was told I would not be able to teach Japanese at the high school since I don't have a credential in Japanese. Why doesn't the Commission on Teacher Credentialing recognize students who have a degree in the subject area? One should not have to take an exam or have a degree questioned when an individual has worked hard to attain another B. A. degree. A teacher should not have to go to a panel or to a group of experts to determine if one completed a number of units.

I worked very hard for this degree during my sabbatical year and it is unfair that a teacher should have to be told he or she cannot be employed because one does not have a credential. Furthermore, in June of this year, I was denied an interview for not having a credential.

During the week of July 19, I sent to CTC the \$55.00 money order for the supplemental authorization which would allow me to teach in grades 9 and below only.

I truly believe that teachers who want to teach another subject should not have to take another exam or complete credential requirements set by the CTC because of the "No Child Left Behind" law. A degree in the subject matter one would like to teach should be adequate.

Thank you very much for your time. I look forward to hearing from you in the near future. It's my understanding a public hearing will be held on August 12, 2004 in Sacramento. I hope you will consider my comments.

*Response:* Subject-matter authorizations are an add-on to a credential to allow an individual to teach a class or classes in a subject outside the area in which he or she earned a credential. These regulations do not address adding a broad single subject area to an existing credential. To add an authorization to teach a single subject area such as foreign language in grades K-12, an individual must either pass the appropriate examinations or verify completion of an approved subject matter program at a Commission-approved California college or university. An individual with a degree in Japanese may contact a California college or university with a Commission-approved program for an evaluation of their course work for equivalency to their subject-matter program.

Individuals who hold a supplementary authorization or are approved by an employing agency on a local teacher employment option continue to be authorized to serve. Both remain appropriate assignments regardless of No Child Left Behind. Employing agencies must decide whether to employ an individual on the basis of a local teaching assignment option. However, an individual must still obtain NCLB subject matter competence. According to the State Board of Education's Title 5 Regulations, an individual may obtain NCLB subject matter competence by holding a degree in a subject area.

2. Peter Kittle, Associate Professor of English, CSU Chico

*Comment:* In lieu of the official response form, please accept this email. On the form, I would have checked the "I do not agree with the proposed changes" box, and would have signed that my response below represents my individual professional opinion.

I write in regard to the proposed changes for NCLB-compliant degree authorizations in English. I am the English Education coordinator at CSU, Chico, and was on the CCTC Subject Matter Advisory Panel that drafted the single-subject English standards adopted last year by the commission. I am also a member of the CSU English Council.

I wish to express some concern with the simple substitution of unit counts (from 10 upper-div/20 upper- and lower-division to 32 units, 16 of which are upper-division) and otherwise keeping the same categories as in the system for Supplementary Authorizations. While the SMAP was in the process of recommending new standards for English teacher preparation, we were told that we would also have the opportunity to make recommendations about supplements. This opportunity never arose in the context of the SMAP, unfortunately. Had it arisen, I (and others on the panel, as well as in English Council) would have suggested that the current categories are out of step with the types of courses regularly offered at the secondary level.

The preponderance of courses offered in middle, junior-, and senior high schools are categorized as "English" courses. They are not specifically marked as composition courses, nor as literature courses. Instead, these English courses combine reading and writing. The purpose behind this is likely twofold. First, the connection between the processes of reading and writing have been well documented in research in the teaching of the English language arts. Second, for courses to meet the A-G requirement for approved B courses in English must teach both writing and reading together. Because of this, I believe that the

offering of specific subject authorizations in English Composition and Literature do not serve a viable function for teachers. Neither of these authorizations would fully qualify a teacher to teach a class labeled as "English." Furthermore, few if any universities would be able to offer 32 units of English Composition coursework to undergraduates, so completing the requirements for that particular authorization would be extremely difficult.

This leaves the Introductory Subject Matter Authorization in English. I believe that the suggested requirements for that authorization are sound. Yet this authorization only allows the holder to teach up through the 9<sup>th</sup> grade curriculum. This leaves a dilemma. Should there be an additional Specific Subject Authorization in English that allows the teacher to teach up through 12th grade, and if so, what should be included in the requirements for that authorization? This is a matter that, I feel, should be addressed by an appropriate professional population. The CSU English Council, for instance, would be ideal. However, as it meets only twice per year (Fall and Spring), and since the proposals for the NCLB-compliant authorizations were not in place during the most recent meeting, this topic has not been one we have been able to discuss as a professional body. At the very least, I recommend the removal of English Composition and Literature as specific subjects, with the possibility that another specific subject covering the English discipline be introduced at a later date. I am joined in this opinion by my English Education colleagues at Cal Poly San Luis Obispo (Jeanine Richison) and Sacramento State (Angus Dunstan). I appreciate your attention to my concerns.

*Response:* Subject-matter authorizations are an add-on to a credential and are not intended to take the place of single subject credentials. The authorizations allow an individual to teach a class or classes in a subject area outside the area in which he or she earned a credential which adds flexibility to employers to assign teachers to teach more than one subject. The upper division requirement was not included in the final proposed regulations for public hearing following discussion at the May 2004 Commission meeting.

The English subject matter panel made suggestions for changes to the supplementary authorizations. Many of the changes from the panel were added to the subject matter authorizations introductory subjects. The English subject matter panels had completed their work by the time the subject matter authorizations were being drafted. A review of several universities or combination of colleges and universities in an area showed there was available course work for the specific subject matter authorizations.

Staff reviewed the California Basic Education Data System (CBEDS) data concerning enrollment in classes when drafting the proposed regulations for specific subject matter authorizations. In the 2003-2004 school year, CBEDS data shows over 11,000 literature courses were taught in approximately 2100 schools and over 2400 composition classes were taught in approximately 600 schools.

Introductory subject matter authorizations require course work in content areas across the subject area and are issued in the broad single subject areas. They authorize teaching the introductory subject matter content for a subject area that is delivered at the elementary or middle school level. This is the reason for the restriction to grade 9 and below. If an individual is teaching a specific subject above grade 9, there are the specific supplementary and subject matter authorizations. If an individual were teaching a broad range of classes in

a subject area at the high school level, the single subject credential in the subject area would be an appropriate choice.

***Responses Representing Organizations Not in Support***

1. CSU Fullerton Secondary Cooperative Teacher Education Program: Claire Palmerino, Director, Academic Advising Services

*Comment:* I write to you on behalf of the CSU Fullerton Secondary Cooperative Teacher Education Program, our secondary education campus council comprised of representatives from the academic and education departments. We reviewed your summary report titled, Additions to Title 5 Regulations Pertaining to Degree Authorizations.

We object to eliminating a minimum of 16 units of upper division work from the new 32-unit supplementary authorization requirements. We understand and support the increase from 20 units to 32 for the supplementary authorizations so as to justify the authorization as the equivalent to a degree; however, we do not agree that a person who has 32 lower division units in a subject has a degree equivalent. NCLB requires that the person have a *bachelor's degree* or equivalent in the subject to be taught; we know of no bachelor's degree that lacks upper division units.

We ask that you reinstate the upper division unit requirement even though the SBE did not include it for the HOUSSE. Surely we want our new teachers entering the field to be subject matter competent; this authorization requires neither a subject matter exam nor a complete subject matter preparation program. Let us at least keep to a minimal standard that includes upper division units.

Thank you for your consideration.

*Response:* The upper division requirement was not included in the final proposed regulations for public hearing. These authorizations are being proposed to offer school districts and teachers authorizations that are aligned with the highly qualified teacher requirements of NCLB. The objective of NCLB is to assure that teachers have the depth of knowledge to teach a specific subject. These authorizations are an add-on to a credential to allow an individual to teach a class or classes in a subject area outside the area in which he or she earned a credential. The teacher has completed subject matter in another subject area. The State Board of Education (SBE) adopted a 32 semester unit requirement as an equivalent to a major to verify depth of knowledge in a subject area for the High Objective Uniform State Standard of Evaluation (HOUSSE) for "not new" teachers but did adopt the 16 upper division units. Staff deleted the upper division unit requirement from the proposed regulations based partially on the SBE action.

In reviewing community college and four-year institutions catalogs, staff found a variety of course work to meet the requirements for the subject matter authorizations. Each discipline at each college and university is treated differently. Staff discussed these results at the May 2004 Commission meeting including the following:

- 1) Flexibility is a key for the teacher to obtain the course work to earn an authorization.
- 2) Some of the proposed authorizations require upper division course work for courses such as English with the advanced composition requirement. In other areas such as the sciences, many courses are only offered at the upper division level.

- 3) Staff found some inconsistencies between upper division courses from college to college. A calculus class at one university was at the lower division level but offered only at the upper division level at another university. An individual seeking to earn a subject matter authorization does not generally complete a major in the subject area that would follow an organized pattern of courses. Teachers should have the opportunity to determine which courses provide the subject matter necessary to earn the authorization to teach at the middle or high school level.
  - 4) Some courses require prerequisites. This may require a teacher to complete more than 32 units because of the number of lower division prerequisite classes. In addition, some upper division units are available only for student completing a major in the subject area.
2. San Jose University: Jean Beard, Coordinator of Subject Matter Programs for Teachers and Robert Cooper, Associate Vice President for Undergraduate Studies

*Comment:* It has not been possible during the Summer when we do not hold regular sessions to consult all of the appropriate faculty for this response. However enough people have provided input to justify the following concerns and examples.

We do not approve of the proposed regulations for the following reasons.

1. There is no requirement for upper division college work for these “equivalents of a major.” We recommend upper division units be part of the required 32 semester units. Our recommendations for this requirement could be one of the following, presented in order of preference.
  - a. Half of the 32 units-16 units must be upper division
  - b. A minimum of 12 units of upper division work. This is the minimum for a major in the California State University System.
  - c. Some upper division units are required. This would allow for differences in subjects and institutional course patterns.
2. There should be an examination alternative for the 32 unit requirement. It may be possible to use existing CSET’s in some cases as suggested below.
  - a. Introductory Subject Authorizations
    - i. Science                      Science I (118) and II (119)
    - ii. Math                         Math I (110) and II(111)
    - iii. Social Science       Social Science I (114) and II (115)
  - b. Specific Subject Authorizations
    - i. Biology                      Science III Biology/Life Science (120)
    - ii. Chemistry                 Science III Chemistry (121)
    - iii. Geosciences             Science III Earth & Planetary Science (122)
    - iv. Physics                     Science III Physics (127)
    - v. Civics/Govt.               Social Science III (116)
    - vi. Literature                 English I (105) and III (107)3.
3. It is not clear how it will be determined who qualifies for a Subject Authorization. Institutions vouch for completion of an Approved Program of subject matter preparation, but not for a Supplementary Authorization. There are some potential complications with leaving the decision to a transcript reader. Two examples are:

- a. In Languages other than English, the 32 unit requirement may penalize native speakers and those who studied a language in high school. These people often do well enough on a proficiency tests in our Foreign Language Department to allow them to start courses in the 2<sup>nd</sup> or 3<sup>rd</sup> year of college work. In these cases the lower division courses are waived but no credit is given for these courses. This means up to 20 units of work in Spanish or French may be waived. Students who take all of the lower division courses would have only 12 more units beyond 2<sup>nd</sup> year college level in the language to meet the Introductory Authorization in Spanish or French, but the proficient incoming student would need 32 units beyond the 2<sup>nd</sup> year courses. Would CCTC accept the waived lower division courses as equivalent to the number of units that are earned by students in these courses.?
  - b. Transcript evaluation from SJSU for the Introductory Subject authorization in English could include courses from the departments of English, Speech Communication, Linguistics and Language Development, and Television, Radio, Film and Theatre.
4. Specific Subject authorization should require 32 units that could be applied to a degree in that field. There are instances, such as Chemistry, where there is non-remedial work that could not be applied to a Chemistry degree and should not be applicable to a Specific Subject Authorization in Chemistry.

*Response:* In reviewing community college and four-year institutions catalogs, staff found a variety of course work to meet the requirements for the subject matter authorizations. Each discipline at each college and university is treated differently. Staff discussed these results at the May 2004 Commission meeting and the upper division requirement was not included in the final proposed regulations for public hearing.

The Commission has a route to earn certification to teach in a departmentalized setting which is passing the appropriate examination(s) to earn a single subject credential in a statutory single subject area. In addition, there is an examination route to earn a specialized science single subject credential which uses some of the examinations noted.

It is the Commission's responsibility to evaluate the course work for the subject matter authorizations. High school level course work is not acceptable towards a subject matter authorization. If a college or university grants units to an individual who passes a proficiency examination, the units may be used towards a subject matter authorization. The Commission has been evaluating transcripts for supplementary authorizations since 1979 including course work completed in departments outside the requested supplementary authorization subject area. Some of the subject matter authorization will require course work from various departments. The Commission is aware that the content of the course work is the determining factor in accepting a course. The Commission's information leaflets with the requirements for supplementary authorization include information about courses outside the subject area requested and the process for submitting verification of the content of the course for equivalency. This will be information that will also be included on the subject matter authorization information leaflets.

The regulations specify that only non-remedial course work is acceptable for the 32 semester unit option. Non-remedial courses are those which are applicable to a bachelor's degree or a higher degree at a regionally accredited college or university. The course work accepted towards a degree is a college or university responsibility.